



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave. S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

June 7, 1993

CERTIFIED MAIL
P 088 099 460

Ms. Pearl Eggerud
United States General Services Administration
GSA Auburn Field Office
Assistant Manager
400 15th Street SW
Auburn, WA 98001

Dear Ms. Eggerud:

Re: Hazardous Waste Compliance Inspection
Seattle Federal Center South - WA8470031891

Thank you for your time and assistance during the hazardous waste compliance inspection on February 11, 1993. As we discussed, there were several areas of non-compliance with the dangerous waste regulations, Chapter 173-303 WAC, which need to be addressed. The following provides a description of these areas as well as a description of actions necessary to correct them. Please take all corrective measures and provide requested documentation by August 14, 1993. Please be advised that failure to correct these non-compliance items may result in the issuance of an Administrative Order and/or penalty under RCW 70.105.80 and/or .095 (Hazardous Waste Management).

1. WAC 173-303-070(8) Small quantity generator wastes were not delivered to a facility which is defined in - 070(8)(b)(ii)(A-E).

You and Mr. Galloway informed us that GSA solvent wastes were given to the BIA or the Air Force to be shipped off-site with their hazardous wastes. Small quantity generators (which your facility appears to be) are not allowed to deliver their wastes to another generator. Please provide a written description as to who will be transporting and disposing of GSA hazardous wastes and waste oils in the future.

I have the following additional comments regarding issues noted during the inspection:

1. Generator Status - Please reassess the quantities of all hazardous wastes generated and accumulated by the GSA at this facility.

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Please then provide a written response as to whether you would still define your facility as a small quantity generator. I have enclosed information regarding the determination of generator status.

If the determination is made that your facility will be regulated as a medium quantity generator (220 - 2200 pounds per month or batch), please be aware that all container labeling requirements in section (200)(1)(c)&(d) must be met.

2. Site Identification Number - Please indicate in writing if other agencies will be allowed to use the existing site identification number (this is regulatorily acceptable) or if they will be required to obtain their own ID number. If they are to obtain their own number, please describe how this requirement will be made known to them.

Please be aware that if other agency wastes are shipped off-site under the existing site identification number, the quantities of waste they generate must be taken into consideration when determining your generator status and added to your annual hazardous waste report.

3. BIA and Other Agency Hazardous Wastes - I would recommend that the GSA take a more active role regarding the management of hazardous wastes generated by agencies which are renting space from the GSA. Please inform me if educational or outreach actions will be taken by GSA to ensure that wastes are managed properly at the site by renters in the future.
4. Manifest Procedures - As we discussed during the inspection, the "generator" name and address on hazardous waste manifests should be that of the Federal Center South. Do not use the contractor's name and address. As the manifest we reviewed was for TSCA wastes, this was not considered a violation of hazardous waste regulations.
5. Segregation of Wastes - Oils should be segregated from various hazardous wastes as waste oils combined with hazardous wastes must be managed as hazardous.
6. Treatment Solutions - Please determine if the chiller and boiler treatment solutions designate as hazardous waste. Please send documentation which supports your determination.

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7. Containment Area Oil/Water Separator - Information provided to Ecology in the past indicated that spills collected from the large containment area are collected in an underground holding tank and then shipped off-site as hazardous waste.

Mr. Galloway stated that spilled materials only pass through an oil/water separator prior to discharge to the Duwamish River. Please determine which description is correct and inform us of your findings.

Thank you for addressing these issues. If you have any questions or require further clarification, please do not hesitate to contact me at 649-7055.

Sincerely,



Jeannie Summerhays
Hazardous Waste Specialist

JS:js:cw

Enclosures: copy of BIA letter
Step-by-Step Packet
2 auto waste booklets for
the FBI and BIA

cc: Bill Galloway, Federal Center South
Barbara Smith, Ecology
Jack Boller, EPA WOO
Martha Turvey, Ecology EBAT

(b:GSACL)